

**RICHARD J. MA, ESQ.**

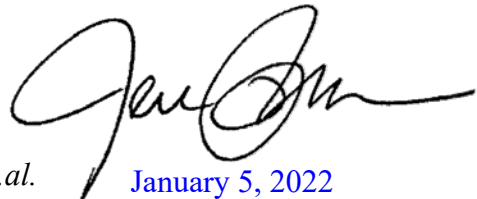
20 Vesey Street, Ste. 400  
New York, New York 10007  
Tel. (212) 431-6938  
Fax. (212) 964-2926  
E-mail: [richardmaesq@yahoo.com](mailto:richardmaesq@yahoo.com)

January 5, 2022

**Via ECF and E-Mail**

Honorable Jesse M. Furman  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Application GRANTED. The motion schedule set forth within is hereby adopted. The pretrial conference is ADJOURNED to March 24, 2022, at 3:15 p.m. Time is excluded in the interests of justice from today, January 5, 2022, until March 24, 2022 for the reasons set forth in defense counsel's letter. The Clerk of Court is directed to terminate Doc. #30. SO ORDERED.



Re: *United States v. Muñoz-Lopez, et.al.*  
19 Cr. 648 (JMF)

January 5, 2022

Dear Judge Furman:

As Your Honor is aware, I represent Mr. Carlos Alberto Castaño-Loaiza in the above-referenced matter. This correspondence is submitted on behalf of all the defendants to respectfully request an extension of the deadline to file pretrial motions (currently January 13, 2022) and adjournment of the next status conference (currently January 20, 2022). This is the parties' first request for an adjournment.

Defense counsel in this matter are still in the process of reviewing the discovery in this matter, which is voluminous. Thus, to allow time for the continued review of discovery, client communications, plea negotiations and preparation of pretrial motions, we respectfully request a 60-day extension to the motion schedule: defense motions to be submitted on or before March 14, 2022; the Government's Response to be submitted on or before March 28, 2022; and defense Replies to be submitted on or before April 4, 2022. In accord with the motion schedule, we also respectfully request that the status conference be adjourned to March 21, 2022, or any date thereafter convenient to the Court. We additionally note that, in light of the ongoing health crisis, the requested adjournment is a sensible precaution to reduce the possibility of exposure to the COVID-19 virus. Based upon my communications with A.U.S.A. Elinor Tarlow and co-counsel, the

parties consent to this request. Finally, in the event that the Court grants this request, the Government requests that time be excluded, with no objection from defense counsel.

Thank you. Should the Court have any questions or concerns, or should any further information be required, please do not hesitate to contact the undersigned.

Respectfully submitted,

/s/ Richard J. Ma

Richard J. Ma, Esq.

cc via e-mail: A.U.S.A. Elinor Tarlow  
Zawadi Baharanyi, Esq.  
Cesar de Castro, Esq.